



Department of Environmental Protection

Jeb Bush Governor Twin Towers Building 2600 Blair Stone Road Tallahassee, Florida 32399-2400 David B. Struhs Secretary

July 18, 2002

Ms. Beverly Washington
Department of the Navy, Petroleum Program
Southern Division - Naval Facilities Engineering Command
PO Box 190010
2155 Eagle Drive
North Charleston, SC 29419-9010

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RE: Site Assessment Report Addendum, Tank Site 245, Naval Station Mayport,

Mayport, FL

Dear Ms. Washington:

I have reviewed the above document dated May 2002 (received May 15, 2002). The document describes recent soil and groundwater investigations at the site. It is noted that as a result of a previous Site Assessment Addendum for this site in 1999, I requested that the Navy prepare a Remedial Action Plan addressing soil and groundwater contamination at the site. Based on my review of the present document, please consider the following:

- 1. The document (page 6) states that the soil petroleum-related contaminants that are observed in soil sample SS-9 is smear zone contamination and "are a result of the groundwater contamination present at the site. Soil sample location SS-9 is near monitoring well MW-8, which is located hydraulically downgradient from the former UST." In my examination of Figures 3, 4, 5 and 6, it appears that soil sampling point SS-9 is directly adjacent to monitoring well MW-4 (that shows no groundwater contamination); furthermore, it appears to be upgradient or slightly side gradient from the former UST location. This would also place it upgradient of monitoring well MW-8 (that contains free product). Given this interpretation, please reconcile the apparent discrepancy in the above quoted statement.
- 2. Based on an interpreted groundwater gradient of east or southeast and the fact that monitoring well MW-1 contained 16 ug/L of benzene in the July 2001 sampling event, should this well be resampled for volatile and semivolatile petroleum constituents? Should an additional monitoring well, downgradient (east to southeast) of monitoring well MW-1 be installed if the benzene quantities are similar to the July 2001 sampling event? Should an additional well be installed between MW-1 and MW-8?
- 3. Should additional soil sampling for analytical determination in the vicinity of, or downgradient of, soil sampling point SS-7 be accomplished?

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The present document recommends that an interim remedial action be done at monitoring well MW-8 following replacement of that well. I concur with that recommendation. Following those actions, we can meet and discuss future recommendations for this site at a Partnering meeting. In we choose to do that, a formal response to this letter is not necessary. If further clarification is required or if you have any questions, please contact me at 850-921-4230.

Imes H. Cason, P.G.

Remedial Project Manager

CC: Cheryl Mitchell, NAVSTA Mayport

Frank Lesesne, HLA, Tallahassee

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